Section 1. Registration Information

Source Identification

Facility Name:	COGEN TECHNOLOGIES LINDEN VENTURE, LP
Parent Company #1 Name:	EAST COAST POWER LLC
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	13-Jun-2019
Postmark Date:	13-Jun-2019
Next Due Date:	13-Jun-2024
Completeness Check Date:	13-Jun-2019
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0006 4324
Other EPA Systems Facility ID:	NJD986632610
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	932949589
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	c/o Phillips 66 Bayway Refinery
Street 2:	RAILROAD & CHEMICO AVENUE
City:	LINDEN
State:	NEW JERSEY
ZIP:	07036
ZIP4:	
County:	UNION

Facility Latitude and Longitude

Latitude (decimal):	40.632222
Longitude (decimal):	-074.215556
Lat/Long Method:	GPS - Unspecified
Lat/Long Description:	Storage Tank
Horizontal Accuracy Measure:	3
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

Owner or Operator

Operator Name:	COGEN TECH. LINDEN VENTURE, LP
Operator Phone:	(908) 474-0800

Mailing Address

Operator Street 1:	P.O. BOX 4400
Operator Street 2:	
Operator City:	LINDEN
Operator State:	NEW JERSEY
Operator ZIP:	07036
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Peter Geissler
RMP Title of Person or Position:	VP Operations and Maintenance
RMP E-mail Address:	Peter.Geissler@jerausa.com

Emergency Contact

Emergency Contact Name:	Justin Krempecki
Emergency Contact Title:	SHIFT SUPERVISOR
Emergency Contact Phone:	(908) 474-0800
Emergency Contact 24-Hour Phone:	(908) 474-0805
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	natalie.sesto@NAES.COM

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	(908) 474-0800
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	LINDEN EMERGENCY RESPONSE COMM

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	60
FTE Claimed as CBI:	

Covered By

OSHA PSM :	
EPCRA 302 :	Yes
CAA Title V:	Yes

Air Operating Permit ID:	BOP130001

OSHA Ranking

OSHA Star or Merit Ranking:	Y

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	11-Mar-2019
Last Safety Inspection Performed By an External Agency:	OSHA

Predictive Filing

Did this RMP involve predictive filing?:	

Preparer Information

Preparer Name:	The WCM Group, Inc., Mary E. Hebert
Preparer Phone:	(281) 446-7070
Preparer Street 1:	P.O. Box 3247
Preparer Street 2:	110 S. Bender Avenue
Preparer City:	Humble
Preparer State:	TEXAS
Preparer ZIP:	77347
Preparer ZIP4:	3247
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:	
Substantiation Provided:	
Unsanitized RMP Provided:	

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000100348
Description:	AQUEOUS AMMONIA SYSTEM
Process Chemical ID:	1000125695
Program Level:	Program Level 2 process
Chemical Name:	Ammonia (conc 20% or greater)
CAS Number:	7664-41-7
Quantity (lbs):	156172
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000100348
Process NAICS ID:	1000101597
Program Level:	Program Level 2 process
NAICS Code:	221112
NAICS Description:	Fossil Fuel Electric Power Generation

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000080300

Percent Weight:	30.0
Physical State:	Liquid
Model Used:	EPA's RMP Guidance for Ammonia Refrigeration Reference Tables or Equations
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000085699

Percent Weight:	30.0
Physical State:	Liquid
Model Used:	EPA's RMP Guidance for Ammonia Refrigeration Reference Tables or Equations
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	Yes
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	EMERGENCY RESPONSE PLAN

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

No records found.

Section 8. Program Level 2

Description:

No description available.

Program Level 2 Prevention Program Chemicals

Prevention Program Chemical ID:	1000063087
Chemical Name:	Ammonia (conc 20% or greater)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7

Process ID:	1000100348
Description:	AQUEOUS AMMONIA SYSTEM
Prevention Program Level 2 ID:	1000062317
NAICS Code:	221112

Safety Information

Safety Review Date (The date of the most recent review or revision of the safety infomation):	11-Mar-2019

Safety Compliance Regulations or Design Codes/Standards

NFPA 58 (or state law based on NFPA 58):	
OSHA (29 CFR 1910.111):	
ASTM Standards:	
ANSI Standards:	Yes
ASME Standards:	
None:	
Other Regulation, Design Code, or Standard:	API
Comments:	

Hazard Review

Hazard Review Date (The date of completion of most recent review or update):	15-Jan-2018
Change Completion Date (The expected or actual date of completion of all changes resulting from the hazard review):	31-Dec-2018

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes

Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	
Tornado:	Yes
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	Yes
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	Yes
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Fire Water Stationary Monitor

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	Twice per day (once per shift operator inspections)

Changes Since Last PHA or PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	

Change Process Parameters:	
Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	Update SOPs and P&IDs; NJ TCPA Catalogue List of Documents

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	17-Jul-2018

Training

Training Review Date (The date of the most recent review or revision of training programs):	31-Jan-2019

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Review Date (The date of the most recent review or revision of maintenance procedures):	04-Jan-2019
Equipment Inspection Date (The date of the most recent equipment inspection or test):	18-Mar-2019
Equipment Most Recently Inspected or Tested:	Ancillary piping, valves, indicators, and relief valves undergo daily and monthly inspections and annual tests as needed

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	11-Mar-2019
Audit Completion Date (The expected or actual date of completion of all changes resulting from the compliance audit):	31-Dec-2019

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Changes Date (Expected or actual date of completion of all changes resulting from the investigation):	
Most Recent Change Date: (The date of the most recent change that triggered a review or revision of safety information):	04-Jan-2019

Confidential Business Information

CBI Claimed:

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	06-Aug-2018

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	29-Nov-2018

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Linden Emergency Response Committee
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(908) 298-3801

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	NEW JERSEY TOXIC CATASTROPHE PREVENTION ACT (NJAC 7:31); NEW JERSEY DISCHARGE PREVENTION REGULATION (NJAC 7:1E)

Executive Summary

Cogen Technologies Linden Venture
Program 2 Executive Summary

System Description

Cogen Technologies Linden Venture (Linden Cogen) owns a 895 megawatt (MW) cogeneration plant in Linden, Union County, New Jersey. The plant is located wholly within the Phillips 66 Bayway Refinery. North American Energy Services (NAES) has been contracted by Linden Cogen to operate the facility. This facility has been in operation since 1992. The land use immediately surrounding the facility is industrial.

Linden Cogen's facility combusts natural gas in six GE Frame 7 combustion turbines to generate electricity. Each combustion turbine is equipped with a heat recovery steam generator (HRSG) that utilizes waste heat from the exhaust to convert water to steam. The steam from each HRSG is combined to drive three steam turbines. Electricity is generated at the gas turbines and the steam turbines. Steam is also piped to offsite industrial facilities. A State-mandated selective catalytic reduction (SCR) system is located within each HRSG to reduce nitrogen oxide (NOx) emissions from the combustion turbine exhaust gas. The SCR consists of a catalyst and injection grid within the HRSG. Ammonia gas is injected through the grid upstream of the catalyst. The ammonia mixes with the exhaust gas, and as the exhaust/ammonia mixture passes through the catalyst, NOx emissions are reduced to nitrogen and water.

Existing Risk Management Activities

The ammonia system has been regulated under New Jersey's Discharge Prevention regulations (NJAC 7:1E) since 1992. These regulations have required the development of plans and procedures to reduce the risks of releases of hazardous substances. The elements of these programs include standard operating procedures, training, maintenance, and emergency response.

Linden Cogen has also implemented environmental programs and procedures to ensure compliance with all applicable environmental regulations. These programs and procedures, maintained in manuals at the plant, are kept up to date and available to all plant personnel. The programs consist of the environmental permits and plans required to operate the facility. In addition to these programs, Linden Cogen also maintains an EHS program. Elements of the Linden Cogen program include hazard work permits, employee training, and general safety procedures. Linden Cogen is also ISO 9000 certified.

In summary, Linden Cogen has developed, implemented, and maintained environmental programs to ensure that risks associated with all plant operations are minimized and employees, nearby populations, and the environment are protected.

Risk Management Program Summary

The Linden Cogen Facility Manager has overall responsibility for maintaining the risk management program. Responsibilities for specific program elements are shared among Linden Cogen and East Coast Power LLC (Linden Cogen's parent company).

Safety information is maintained at the facility. As there have been no changes to the ammonia system since plant start-up, modifications to the safety information have been minimal. Operating procedures have been implemented at the facility and address the possible operating conditions of the ammonia system. A maintenance program is in place and consists of maintenance procedures, testing and inspection schedules, and a work order system that initiates and tracks work and inspections performed on the ammonia system.
Hot works procedures along with other hazard permits (general work permit, lockout/tagout, etc.) exist at the plant and are applicable to all plant work. Contractors working on the ammonia system or any plant equipment/system are required to comply with the facility's contractor safety program. Currently, there are no planned changes to improve safety under consideration.
All facility personnel must complete initial and refresher training on procedures applicable to their position. All operators and maintenance personnel undergo a qualification process which addresses ammonia system operating procedures and/or maintenance procedures along with emergency response training.
Administrative personnel must undergo emergency response training.

Compliance audits will be conducted on an annual basis because the NJ TCPA RMP program 2 has to follow program 3

requirements. These audits will consist of a risk management program audit and a safety review of the ammonia system. The program audit will review the risk management program and procedures to ensure the program is being implemented. The ammonia system safety review will consist of an audit of the ammonia system and operating procedures and interviews with plant personnel to ensure that the ammonia system is designed and operated in accordance with the appropriate safety information.

Employee participation has always been implemented at the facility. Employees are included in hazard reviews and incident investigations even though it is not a requirement of the RMP regulations. In addition, employees conduct self-assessments (plant audits conducted by employees), hold monthly safety meetings and daily safety talks, conduct annual drills and participate in safety committees. Incident investigation procedures have been implemented at the facility since start up.

A hazard review was conducted in 2013. The hazard review identified the hazards associated with the process, opportunities for equipment malfunctions or human errors that could cause an accidental release, safeguards used or needed to control the hazards or prevent equipment malfunctions or human error, and steps used or needed to detect or monitor releases. Once the hazard review was completed, a list of recommendations was developed and reviewed by plant personnel and management. The recommendations have been implemented at the site to further reduce the risk associated with the aqueous ammonia system.

There have been no accidents or releases from the ammonia system within the last five years.

Emergency Response

An emergency response program has been implemented at the facility since the plant's construction. The emergency response program includes an emergency response plan and coordination of emergency information and activities with the Linden Fire Department. The emergency response plan contains the information and procedures necessary to respond to a release of any hazardous material at the site. The shift supervisor at the facility is the Emergency Coordinator, as necessary. The facility runs 24/7 with 4 shifts. In addition to Justin Krempecki listed in Section 1.8(a), the other shift supervisors are Philip Esteves, John Buchman and Patrick Neilan.

Emergency information includes a list of emergency response personnel, notification requirements, evacuation procedures, and health/first aid data. Linden Cogen has confirmed with the Linden Fire Department that personnel and equipment necessary to respond to a release of a hazardous substance at the site will be provided. Coordination with the fire department has included providing a copy of the emergency response plan. The fire department has taken part in plant emergency response drills and drill critiques. Linden Cogen also contributes emergency equipment to the fire department. In addition to emergency drills, the fire department tours the facility to familiarize its personnel with plant operations and the locations of potential hazards. In addition, plant personnel are trained in the procedures necessary to respond to emergency releases.